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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
JEREMY HALGAT,  
  
Defendant.

Case No: 2:13-cr-00241-APG-VCF

**MOTION FOR AN EXTENSION OF  
THE DEADLINE FOR DEFENDANT  
HALGAT TO FILE HIS REPLY IN  
SUPPORT OF SUPPLEMENTAL  
BRIEF IN SUPPORT OF HIS  
MOTIONS TO COMPEL [DKT 199]  
and  
[PROPOSED] ORDER**

(Second Request)

Defendant Halgat, by a through his appointed counsel, Melanie Hill, respectfully moves the Court for an Order extending the deadline to file Defendant Halgat's Reply in support of his supplemental brief in support of his motions to compel for two business days until next Tuesday, April 5, 2016. Prior to filing a stipulation to extend the Reply deadline last week, defense counsel requested a two-week extension of the deadline determining that the additional time was necessary to finalize the Reply. The government only agreed to stipulate to a five-day extension until April 1, 2016 and the Court granted the stipulation. Defense counsel has been working diligently to complete the Reply by that deadline, but has been unable to do so.

1 After close of business yesterday, defense counsel asked for an additional one business  
2 day extension until Monday, April 4, 2016 and followed up on the request again today by email.  
3 Defense counsel did not receive a response back from counsel for the Government. However,  
4 counsel received an auto reply from Mr. Duncan informing counsel that he is out of the office  
5 until April 6, 2016. Counsel is also aware that Ms. Silva is preparing for a trial set to  
6 commence this coming Monday and may have been unavailable to address the stipulation  
7 request.  
8

9 In an attempt to eliminate the need for filing the instant motion and instead handling the  
10 matter by stipulation of the parties, defense counsel waited until this evening for a response  
11 from Ms. Silva prior to preparing the instant motion for an extension. Receiving no response –  
12 which is completely understandable given Government counsel's circumstances – defense  
13 counsel is filing the instant motion requesting a two business day extension until next Tuesday,  
14 April 5, 2016 to file Mr. Halgat's Reply.

15 Defense counsel has been working diligently on the Reply and will be able to complete  
16 and file it by the requested deadline. Defense counsel is requesting additional time to file this  
17 Reply because the Government raised a new mootness argument in its response to Mr. Halgat's  
18 supplement and defense counsel needs additional time to research and brief the issue of the  
19 mootness of the CI's cell phone. Defense counsel certifies that this second brief extension  
20 request is not made to delay these proceedings, but is made to ensure defense counsel has  
21 adequate time to fully research and brief this new mootness issue and finalize the Reply.  
22

23 Respectfully submitted this 1st day of April, 2016.

24 LAW OFFICE OF MELANIE HILL

25 /s/ Melanie A. Hill

26 MELANIE A. HILL (NV Bar # 8796)

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*Attorney for Defendant Jeremy Halgat*

**ORDER**

Based on Defendant Halgat's motion for an extension of the Reply deadline and good cause found,

IT IS HEREBY ORDERED that Defendant Halgat's Reply in support of supplemental brief in support of his motions to compel [Dkt 199] is due by April 5, 2016.

Dated this 4th day of April, 2016.

  
\_\_\_\_\_  
ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1<sup>st</sup> day of April, 2016, I electronically filed the MOTION FOR AN EXTENSION OF THE DEADLINE FOR DEFENDANT HALGAT TO FILE HIS REPLY IN SUPPORT OF SUPPLEMENTAL BRIEF IN SUPPORT OF HIS MOTIONS TO COMPEL [DKT 199] and [PROPOSED] ORDER with the Clerk of Court using the CM/ECF system, which will cause the document to be served upon the following counsel:

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/s/ Melanie A. Hill  
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